



*Annual Performance Report Form*

**Facility Name:** Simpson Tacoma Kraft Company

**Performance Track ID #:** A100009

**Annual Performance Report #:** 1

**Reporting Year:** 2001

**Due Date:** April 1, 2002

## Section A

# General Facility Information

To the extent possible, EPA will pre-complete items A.1-A.8 for you. Please ensure that the information in A.1-A.8 below is accurate, complete, and up to date. Please supply or revise any information as necessary and then check the box to the left of the item(s) to indicate where changes have been made. Items A.9 and A.10 cannot be pre-completed; please respond as directed in A.9 and A.10 below.

*Did you make changes? If so, check box.*

- A.1 ☐ Name of your facility: Simpson Tacoma Kraft Company
- A.2 ☒ Name of your parent company: Simpson Investment Company
- A.3 ☐ Facility contact person for the Performance Track program  
Name: Mr./Mrs./Ms./Dr. Gregory Narum  
Title: Environmental Manager  
Phone: 253-596-0234 Fax: 253-596-0142 E-mail: gnarum@simpson.com
- A.4 ☐ Facility's location  
Street Address: 801 Portland Avenue  
Street Address (cont.):  
City/State/Zip Code: Tacoma/WA/98421
- A.5 ☐ Facility's website address (if any): www.simpson.com
- A.6 ☐ Number of employees (full-time equivalents) who currently work in the facility:  
☐ Fewer than 50 ☐ 50 - 99 ☐ 100 - 499 ☒ 500 - 1000 ☐ More than 1000
- A.7 ☐ Does your company meet the Small Business Administration definition of a small business for your sector? ☐ Yes ☒ No
- A.8 ☐ North American Industrial Classification System (NAICS) Code(s) that are used to classify business at the facility: 3221 \_\_\_\_\_
- A.9 ☐ In your application and, perhaps, in previous annual performance reports, you described what your facility does or makes. Have there been any (additional) changes to your facility's list of products and/or activities? If so, please list them in the space below. ☐ Yes ☒ No
- A.10 ☐ Please update the list of environmental requirements that apply to your facility. In the space below, indicate any changes that have taken place during this reporting period. If you have no changes to report, please write "No changes."  
  
No changes

## Section B

# Environmental Management System

**B.1 Environmental Management System Assessment.** Please summarize EMS assessments conducted *during the year*. Attach additional sheets as necessary.

a. Was an EMS audit or other assessment done by an independent third party?

☒ Yes ☐ No

If yes, please provide the *type* (e.g., ISO 14001 certification), the *scope*, and the *dates* (mo/yr) of each assessment.

Independent third party assessment of existing EMS. This was a review of all elements of the facility's EMS to assess its conformance with Performance Track criteria, identify deficiencies, and recommend improvements.

Assessment performed Dec/2001 - May/2002.

b. Was an internal or corporate EMS audit conducted? ☒ Yes ☐ No

If yes, please provide the *scope* and the *dates* (mo/yr) of each audit.

An internal assessment of all elements of the EMS was done jointly with the third party assessment. The internal assessment was led by the facility's Environmental Manager and involved representatives from most mill departments.

Assessment performed Sept/2001 - May/2002.

In addition, EMS evaluation is one of the objectives of the Simpson Corporate environmental compliance audit performed Oct. 23, 24, and 25, 2001.

c. Was a compliance audit conducted? ☒ Yes ☐ No

If yes, please provide the *scope* and the *dates* (mo/yr) of each audit, and indicate *who* conducted the audit(s) (e.g., facility staff, corporate groups, third party).

Water program compliance audit performed Oct. 23, 24, and 25, 2001. Scope included NPDES Permit, SPCC, OPA 90, and Safe Drinking Water Act compliance. Conducted as part of Simpson Corporate annual environmental compliance audit program. Audit team was composed of three environmental staff members from other Simpson operating locations and one independent consultant with extensive pulp and paper environmental experience. Findings were reviewed with Simpson Corporate EHS Director and Corporate Legal Dept.

d. (Optional) If you would like to describe any other audits or inspections that were conducted at your facility, please do so here.

Washington Dept. of Ecology NPDES and U.S. Coast Guard marine transfer facility inspections.

## Section B

(continued)

### B.1

e. Briefly summarize corrective actions taken and other improvements made as a result of your EMS assessments and compliance audits.

Improved EMS documentation and general awareness by preparing a formalized Plan that describes the elements of the facility's EMS and how they will be accomplished. The Plan includes a set of Targets and Objectives that was developed with the participation of representatives from most mill departments. EMS review has been made part of regular mill management performance review meetings.

Compliance audit findings had to do with satisfying SPCC Plan regulations. Comprehensive SPCC Plan update has been completed and approved by Washington Dept. of Ecology. Necessary equipment and procedure changes to address other findings were completed.

f. Has your facility corrected all instances of potential non-compliance and EMS non-conformance identified during your audits and other assessments?

☐ Yes ☒ No ☐ No such instances identified

If no, please explain your plans to correct these instances.

EMS document is in draft form and was reviewed during EPA Performance Track site visit held on April 4, 2002. We plan to make revisions and produce the final version after we receive a formal evaluation from the site visit. This evaluation has not been received as of July 1, 2002.

All compliance audit findings have been corrected.

g. When was the last Senior Management review of your EMS completed? *mo/yr* Dec/2001

Who headed the review?

Name: Mr./Mrs./Ms./Dr. Mr. Donald C. Johnson

Title: Vice President and General Manager, Simpson Tacoma Kraft Company

## Section B

(continued)

**B.2 ISO 14001 Certification.** Is your facility currently certified to ISO 14001? ☐ Yes ☒ No

**B.3 Environmental Aspects Identification.** When did your facility last conduct a systematic identification and/or review of your environmental aspects? *mo/yr* Dec/2001 - Mar/2002

**B.4 Progress Toward Achieving Objectives and Targets.** In the table below, please provide a narrative summary of progress made toward EMS objectives and targets. **You may limit the summary to environmental aspects that are *significant* and towards which *progress* has been made during the reporting year.** In cases where progress relates specifically to a Performance Track performance commitment, complete the *Environmental Aspect* column, but in the *Progress* column simply refer to the performance commitment tables in Section C, i.e. "See Section C." Attach additional sheets as necessary.

<i>Environmental Aspect</i>	<i>Progress Made This Year</i> (e.g., quantitative or qualitative improvements, activities conducted)
	Developed a formalized set of Targets and Objectives with participation of all mill departments.
Emissions of Particulate Matter	Reduce fugitive emissions of wood ash. Progress: planned, budgeted, and received approval for a \$750M project to load ash directly into rail cars. Equipment to be operating in 2002.
Vulnerability and Potential for Releases of Hazardous Substances	Moved 93% sulfuric acid tanks (total 10,000 gallons) from exposed position beside the river to a more protected location inside the boiler house. Also eliminated an underground piping run.
Vulnerability and Potential for Oil Spills	Installed oil pipeline flow meters to alarm in case of a flow discrepancy (pipeline leak).
Vulnerability and Potential for Oil Spills	Replaced #1 and 2 upenders in paper shipping areas. New equipment reduces hydraulic oil leaks.
Total Energy Use	Evaluated a steam turbine cogeneration project that would improve overall mill energy efficiency. \$250M spent on engineering study. Project abandoned because of inadequate economic return.

## Section C

# Environmental Performance Commitments

Please use the tables on pages 6-9 to summarize your facility's environmental performance against your Performance Track performance commitments. Complete only those boxes related to the baseline, current year, and performance commitment. If any of the boxes have been pre-completed for you, please verify the information. If you find information that is incorrect, cross it out and write in the correct information. **Leave blank any columns for future reporting years.**

C.1

### Performance Commitment 1

a. Use this table to report data related to your first performance commitment.

**Category** (see page 16 of the instructions): Water Use

**Aspect** (see page 16 of the instructions): Total Water Use

	<i>Baseline</i> (as stated in your application)	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment</i> (the goal stated in your application)
<i>Calendar Year</i>	2000	2001			2003
<i>Actual Quantity</i> (per year)	6.97	6.51			5.84 (optional)
<i>Measurement Units</i>	billion gallons				
<i>Normalizing Factor*</i>	1.0	0.97			1.09 (optional)
<i>Basis for your Normalizing Factor*</i>	Total off-machine production. Source: 2002 Budget Plan.				
<i>Normalized Quantity*</i> (per year)	6.97	6.71			5.36

\*See pages 17-19 of the instructions for more information

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

First 5 months of PT participation (Aug.-Dec. 2001). Installed additional water metering systems and implemented several water reuse projects. Most benefits expected to appear in 2002.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

None.

# Section C

(continued)

## C.2

### Performance Commitment 2

a. Use this table to report data related to your second performance commitment.

<b>Category</b> (see page 16 of the instructions): Air Emissions					
<b>Aspect</b> (see page 16 of the instructions): Emissions of Particulate Matter					
	<i>Baseline</i> (as stated in your application)	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment</i> (the goal stated in your application)
<i>Calendar Year</i>	2000	2001			2003
<i>Actual Quantity</i> (per year)	607	1362			300 (optional)
<i>Measurement Units</i>	Minutes of unavoidable excess emissions exceeding opacity standard for #4 Recovery Boiler. There is no way to convert this to a mass basis or other quantity. The actual mass emission is very low, and has not been measured reliably, because these emissions have often occurred when the unit is shut down and stack flow is low. The periods of these emissions are now reported monthly to Washington Dept. of Ecology.				
<i>Normalizing Factor*</i>	1.0	0.97			1.11 (optional)
<i>Basis for your Normalizing Factor*</i>	Air Dry Unbleached Tons of Virgin Pulp (ADUTP). Source: 2002 Budget Plan.				
<i>Normalized Quantity*</i> (per year)	607	1404			270
*See pages 17-19 of the instructions for more information					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

First 5 months of PT participation: no changes implemented. Large capital improvements scheduled in 2002 are expected to achieve commitment.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).  
None.



# Section C

(continued)

## C.3 Performance Commitment 3

a. Use this table to report data related to your third performance commitment.

<b>Category</b> (see page 16 of the instructions): Air Emissions					
<b>Aspect</b> (see page 16 of the instructions): Emissions of Toxics					
	<i>Baseline</i> (as stated in your application)	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment</i> (the goal stated in your application)
<i>Calendar Year</i>	2000	2001			2003
<i>Actual Quantity</i> (per year)	1323	508			1054 (optional)
<i>Measurement Units</i>	pounds				
<i>Normalizing Factor*</i>	1.0	0.97			1.11 (optional)
<i>Basis for your Normalizing Factor*</i>	Air Dry Unbleached Tons of Virgin Pulp (ADUTP). Source: 2002 Budget Plan.				
<i>Normalized Quantity*</i> (per year)	1323	528			950
*See pages 17-19 of the instructions for more information					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

First 5 months of PT participation: new procedures developed and implemented governing fuel changes for incineration device, for starting up backup incineration device, and for shutting down the production process in the event of extended loss of incineration device.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

None.

# Section C

(continued)

## C.4 Performance Commitment 4

a. Use this table to report data related to your fourth performance commitment.

**Category** (see page 16 of the instructions): Waste

**Aspect** (see page 16 of the instructions): Hazardous Solid Waste Generation

	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	2000	2001			2003
<i>Actual Quantity (per year)</i>	4300	4165			(optional)
<i>Measurement Units</i>	pounds				
<i>Normalizing Factor*</i>	1.0	0.97			(optional)
<i>Basis for your Normalizing Factor*</i>	Total off-machine production. Source: 2002 Budget Plan.				
<i>Normalized Quantity* (per year)</i>	4300	4294			2000
*See pages 15-17 of the instructions for more information					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

First 5 months of PT participation: we started to test a still for recycling paint solvent. This will reduce generation of our largest HW stream.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

None.

## Section D

# Public Outreach and Performance Reporting

**D.1** Please briefly summarize the public outreach and reporting activities that your facility has conducted during the year. Feel free, but not obligated, to attach supporting materials (e.g., meeting agendas, public announcements).

Employee newsletter (SimTac) explained Performance Track program and our commitments.

Community Advisory Group met January 2002 (agenda attached) and we plan to convene once a year.

'Report to the Community' newsletter published quarterly and distributed to a wide group of community leaders and citizens. Environmental issues are featured when appropriate, including a report on the Community Advisory Group meeting in the February 2002 issue. Report to the Community is also published in the Tacoma News Tribune. This will be the way that we will initially advise the community of the availability of our PT Annual Report.

Hosted public beachwalk of the St. Paul Waterway Superfund remediation site.

Hosted approximately 12 tours by interested environmental and educational groups.

**D.2** Please indicate which of the following methods your facility plans to use to make its Performance Track Annual Performance Report available to the public. Please check as many as are appropriate.

☒ Website (URL [www.simpson.com](http://www.simpson.com))

☐ Open House

☐ Meetings

☒ Press Releases

☒ Community Advisory Panel

☐ Other

## Section E

### Self-Certification of Continued Program Participation

On behalf of Simpson Tacoma Kraft Company,  
(name of my facility)

I certify that

- ◆ I have read and agree to the terms and conditions specified in *the National Environmental Performance Track Program Guide*. This facility, to the best of my knowledge, continues to meet all program criteria;
- ◆ I have personally examined and am familiar with the information contained in this Annual Performance Report. The information contained in this report is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete;
- ◆ My facility has an environmental management system (EMS), as defined in the Performance Track EMS criteria, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- ◆ My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements; and the facility has corrected all identified instances of potential or actual noncompliance; and
- ◆ Based on the foregoing compliance assessments and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Performance Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior manager with responsibility for the facility and am fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is part of the National Environmental Performance Track program.

Signature/Date \_\_\_\_\_

Printed Name Mr./Mrs./Ms./Dr. Donald C. Johnson

Title Vice President and General Manager

Phone Number/E-mail Address 253-596-0284

Facility Name Simpson Tacoma Kraft Company

Facility Street Address 801 Portland Avenue/ Tacoma/ WA/ 98421

Performance Track Identification Number A100009

### **Paperwork Reduction Act Notice**

The public reporting and recordkeeping burden for this collection of information is estimated to average 188 hours per respondent annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.